UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In re	)	
655 CORPORATION,	)	CHAPTER 11
	)	CASE NO. 06-13020-JNF
Debtor.	)	

MOTION FOR ENTRY OF STIPULATED ORDER ALLOWING MOTION TO APPROVE STIPULATION BETWEEN MARK G. DEGIACOMO CHAPTER 11 TRUSTEE AND LBM FINANCIAL LLC AND CANCELLING HEARING

Mark G. DeGiacomo, the Chapter 11 Trustee (the "Trustee") of 655 Corporation (the "Debtor"), hereby requests that this Court enter the Stipulated Order, filed concurrently herewith, allowing the Trustee's Motion to Approve Stipulation (the "Stipulation") between the Trustee and LBM Financial, LLC ("LBM").

In support of this Motion, the Trustee states as follows:

1. On April 7, 2009, the Trustee filed the Stipulation and a Motion to Approve the Stipulation to resolve the claims asserted by the Trustee against LBM in adversary proceeding No. 08-01275.

2. On May 4, 2009, Cathay Bank ("Cathay") filed a Limited Opposition to the Stipulation seeking the inclusion of certain language to protect its rights under the Stipulation.

3. A hearing on the Motion to Approve Stipulation is scheduled for June 2, 2009 (the "Hearing").

4. The Trustee, LBM and Cathay have agreed to entry of the attached Stipulated Order, which addresses the concerns raised by Cathay in its Limited Opposition.

WHEREFORE, the Trustee requests that this Court enter an Order allowing the Motion for Entry of the Stipulated Order Allowing the Motion to Approve Stipulation Between Mark G. DeGiacomo, Chapter 11 Trustee of 655 Corporation and LBM Financial, LLC and cancelling the Hearing.

Respectfully submitted,

MARK G. DEGIACOMO, CHAPTER 11
TRUSTEE OF 655 CORPORATION,

By his attorneys,

/s/ Taruna Garg
Thomas S. Vangel, BBO #552386
Taruna Garg, Esq. BBO # 654665
Murtha Cullina LLP
99 High Street
Boston, MA 02110
617-457-4000
617-482-3868

Dated: April 7, 2009